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December 20, 2006

Via E-Mail

The Honorable James B. Gulliford
Assistant Administrator
Office of Prevention, Pesticides and Toxic Substances
U.S. Environmental Protection Agency
MC: 7101M
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Rodenticide Registrants Task Force

Dear Mr. Gulliford:

On behalf of the Rodenticide Registrants Task Force (RRTF), I wish to thank you for the opportunity to meet with you and your staff on December 13, 2006, to discuss the RRTF's proposed voluntary stewardship measures, as well as the U.S. Environmental Protection Agency's (EPA) potential forthcoming risk mitigation steps. As I mentioned during the meeting, the RRTF's stewardship measures have advanced considerably in recent months. In our meeting, we also discussed the work that was done to develop labeling that would be more consumer friendly (simplified) to help consumers read the label and follow use directions. Attached are examples of product labels that were developed to demonstrate how simplified labeling might look once we received EPA approval to move forward. These examples compare the current label with the simplified label (before & after). Importantly, we believe these label enhancements, rooted in the excellent work of the Rodenticide Stakeholders Workgroup, would largely address EPA's concerns with rodenticides. The RRTF is also prepared to work expeditiously with EPA to develop the other key elements of the RRTF's stewardship measures.

The RRTF remains, however, steadfastly opposed to any requirement mandating bait boxes for consumer uses of rodenticides. As discussed during our meeting, bait boxes have significant drawbacks, not the least of which are cost and availability. Any requirement mandating the use of bait stations would effectively preclude consumer rat control because there are no rat bait stations easily available to consumers for purchase. In addition, bait boxes do not

The Honorable James B. Gulliford

December 20, 2006

Page 2

preclude children from accessing bait. In fact, the large bait boxes may actually serve to attract younger children, who mistake bait boxes for toys. For all the reasons discussed during our recent meeting, we urge EPA to more carefully and comprehensively assess the likely impact of what we understand is under consideration, particularly the impact on those public housing communities that rely on readily accessible, inexpensive rodenticides to combat the growing challenge of rodent control. The RRTF would welcome the opportunity to further discuss these issues with you and your staff. While time did not allow us to more extensively discuss other areas of identified concern regarding rodenticide use (for example, alleged impact on non-target wildlife), I can assure you the RRTF remains open to further discussing these or any other matters of interest to EPA with you or your staff.

Again, we thank you for the opportunity to meet with you, and hope you have a pleasant holiday season.

Sincerely,

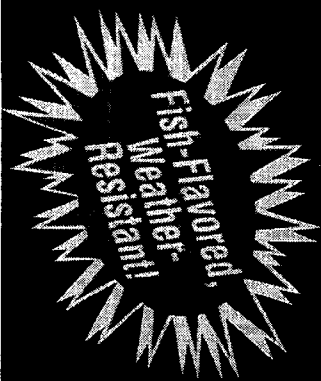
John L. Hott

John L. Hott, Ph.D.
Chair

Attachments

cc: Susan B. Hazen (w/attachments) (via e-mail)
Margaret N. Schneider (w/attachments) (via e-mail)
Teresa (Terry) R. Green (w/attachments) (via e-mail)
James J. Jones (w/attachments) (via e-mail)
Anne E. Lindsay (w/attachments) (via e-mail)
Debra F. Edwards, Ph.D. (w/attachments) (via e-mail)
Susan T. Lewis (w/attachments) (via e-mail)
Scott B. Garrison, Esquire (w/attachments) (via e-mail)
James V. Aidala (w/attachments) (via e-mail)
Rodenticide Registrants Task Force (w/attachments) (via e-mail)

Shareholders Only
10/18/99
Before
Specimen Only



8
BAIT
PACKS

Ramik®

MINI BAIT PACKS

*Fish Flavored, Weather-Resistant
Rodenticide*

EPA Reg. No. 61262-23 • EPA Est. No. 61282-WI-1

ACTIVE INGREDIENT

Diphacinone (2-Diphenylacetyl-1,3-
indandione) 0.995%

INERT INGREDIENTS 99.995%

TOTAL 100.000%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION: See Back Panel for
Additional Cautions

NET WEIGHT: 12 oz. (340 g.)

Contains Eight 1.5 oz. (43-g) placepacks

HACCO, Inc. • P.O. Box 7190 • Madison, WI 53707

Ramik is a registered Trademark of HACCO, Inc. U.S. Patent No. 4,581,873



Before

6

NOTICE OF WARRANTY: Because Manufacturer and Seller have no control over storage, handling, and conditions of use, which are of critical importance, Manufacturer and Seller make no representation or warranty, either express or implied, for results due to misuse, improper handling, or storage of this material. Nor do Manufacturer or Seller assume any responsibility for injury to persons, crops, animals, soil or property arising out of misuse, improper handling or storage of this material.

**MINI
BAIT
PACKS**
Ramik®
Rodenticide

**Fish-Flavored,
Weather-
Resistant!**

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: Read this entire label and follow all use directions and use precautions.

IMPORTANT: Do not expose children, pets, or other non-target animals to rodenticides. To help to prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and non-target wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hooved livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS: For control of Norway rats, roof rats and house mice in and around homes, industrial and agricultural buildings, and similar man-made structures. Do not place bait where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS: Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS

Rats: Apply 3 to 10 bait packs per placement. The amount of bait contained in the packs in this box is unlikely to be sufficient to kill more than 3 to 12 rats. Maintain an uninterrupted supply of fresh bait for at least 10 days.

Mice: Apply one placepack per placement location. Space placements at 8- to 12-foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.

Rats/Mice: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store only in original closed container in a cool, dry place inaccessible to children and pets. Store separately from fertilizer and away from products with strong odors which may contaminate the bait and reduce acceptability. Spoilage should be carefully swept up and collected for disposal.

PESTICIDE DISPOSAL: Commercial use: Wastes resulting from the use of this product should be securely wrapped in several layers of newspaper and then disposed of onsite or at an approved waste disposal facility. **Household use:** Securely wrap wastes resulting from the use of this product in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Commercial use: Dispose of empty container in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. **Household use:** Do not reuse container. Wrap container securely in several layers of newspaper and discard in trash.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdose. Repeat as necessary based on monitoring of prothrombin times.

IN ALL CASES OF HUMAN INGESTION IMMEDIATELY NOTIFY A PHYSICIAN.
ENVIRONMENTAL HAZARDS

This product is toxic to mammals and birds. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

Rat & Mouse Killer Bait Packs

Draft

Rat & Mouse Killer Bait Packs

ACTIVE INGREDIENT:

Diphacinone (2-diphenylacetyl-1,3-indandione)..... 0.005%

OTHER INGREDIENTS..... 99.995%

TOTAL..... 100.000%

EPA Reg. No. 61282-6

EPA Est. No. 61282-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Safety Information

**MAY BE HARMFUL
OR FATAL IF EATEN
BY CHILDREN OR
PETS**

Manufactured By:

Hacco, Inc.

P.O.Box 7190

Madison, WI 53707

NET CONTENTS: 8x2oz. (1 lb./454g.)



0 23626 01340 7

After

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

READ THIS ENTIRE LABEL: Follow all use direction and use precautions.

IMPORTANT: Place this product out of the reach of children, pets, and other animals.

Use this product only in and around homes, apartments and other residential buildings to control Norway rats, roof rats and house mice.

Baiting Directions

1. Clean up any spilled food or garbage.
2. Place bait out of reach of children and pets in places where rodents or signs of rodents are seen. To find where rodents live and travel, search for droppings, urine stains, signs of gnawing, nests, and burrows. Look for these signs in dark, concealed areas, along walls and in corners.
3. To keep children and pets from getting to bait, place bait well behind heavy appliances or furniture, or inside locked cupboards or rooms, where rodent signs have been found. Make sure that children cannot reach bait where it is placed. Do not place bait out in the open, away from walls or other vertical structures. If bait cannot be placed out of the reach of children and pets, then bait must be placed in a tamper-resistant, locked bait station. Secure bait stations if necessary to prevent spillage. For even more information about tamper-resistant bait stations, contact

1. To prevent spillage, bait should be placed in small disposable trays and not directly on the floor. For rats, start with two bait packs per placement and add up to a maximum of eight bait packs per placement if you determine that there is a high level of rat activity at that location. One placement should be enough for a 10' by 12' foot room. Use another placement in larger areas. Maintain an uninterrupted supply of fresh bait for at least 10 days. For mice, apply one bait pack per placement. Space placements 8 to 12 feet apart. Maintain an uninterrupted supply of fresh bait for at least 15 days.
5. For best results, leave bait undisturbed for at least two days. Check bait every two days, adding fresh bait as needed. Keep spilled bait

cleaned up. Bait placements not fed from for five consecutive days may be relocated as needed. If you are in an area where you may get reinfestations from adjoining property, permanent bait placements should be made. Permanent placements should be checked periodically.

5. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.

7. Clean all utensils used for measuring or applying bait and do not use them with human or pet foods. Collect and dispose of dead rodents properly.

8. To keep rats and mice away, clean up spilled food immediately and remove garbage. Clean up areas where rodents may nest and breed, such as piles of newspapers and trash.

STORAGE AND DISPOSAL

- Product Not Being Used must Be Stored out of Reach of Children and Pets.

- Store product not being used in the original, closed container in a cool, dry place.

- Do not reuse container.

- Wrap used container and leftover or spilled product in newspaper and discard in the trash.

SAFETY INFORMATION AND FIRST AID

CAUTION: May be harmful if swallowed. Keep away from children, pets and other animals. If swallowed, this product may reduce the clotting ability of the blood and cause bleeding.

FIRST AID: If bait is eaten by a human, contact a Poison Control Center or a doctor. If bait is eaten by a pet, contact a veterinarian. Have this label handy when seeking treatment.

NOTE TO DOCTOR OR VETERINARIAN: This product contains diphacinone, an anticoagulant. When administered properly by a doctor or veterinarian, vitamin K₁ is antidotal.

FOR A MEDICAL EMERGENCY INVOLVING THIS PRODUCT, CALL: 1-800-228-5635, EXT. 136, OR CALL COLLECT, 612-351-8180, EXT. 136.

ENVIRONMENTAL HAZARDS

This product is hazardous to animals and birds. Do not apply directly to water.

NOTICE OF WARRANTY(OPTIONAL)

Rat & Mouse Killer Bait Pack

Current
d-CON READY MIXED BAITBITS



d-CON

READY MIXED BAITBITS

KILLS MICE AND RATS

4

READY-TO-USE
 BAIT FILLED TRAYS

CAN KILL IN ONE FEEDING

Mice and rats will die within 4 or 5 days

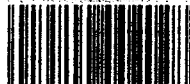
Keep out of reach of children.

CAUTION: May be harmful or fatal if swallowed.
 Read additional precautionary statements on back panel.

ACTIVE INGREDIENT: Brodifacoum 3-[3-(4'-bromo-[1,1'-biphenyl]-4-yl)-1,2,3,4-tetrahydro-1-naphthalenyl]-4-hydroxy-2H-1-benzopyran-2-one..... 0.005%
 INERT INGREDIENTS..... 99.995%
 TOTAL 100.000%

NET CONTENTS 4/3.0 OZ. (85g) NET WT. 12 OZ. (340g)

d-CON READY MIXED



Before

d-CON

READY MIXED BAITBITS
 KILLS MICE AND RATS

Kills Warfarin-Resistant
 House Mice and
 Warfarin-Resistant
 Norway Rats

**CAN KILL
 IN ONE
 FEEDING**

Mice and rats may consume a
 lethal dose in one feeding
 with first dead rodents
 appearing 4 or 5 days after
 feeding begins.



MADE IN THE USA

SOLVING AMERICA'S
 RODENT PROBLEMS
 FOR OVER 40 YEARS

**SATISFACTION
 GUARANTEED OR
 YOUR MONEY BACK**

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 Household Products Division
 Reckitt & Colman Inc.
 Wayne, NJ 07474
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Simplified
d-CON READY MIXED BAITBITS



d-CON

READY MIXED BAITBITS

KILLS MICE AND RATS

4

READY-TO-USE
 BAIT FILLED TRAYS

FLAVOR ATTRACTIVE TO MICE AND RATS

CAN KILL IN ONE FEEDING

Mice and rats may consume a lethal dose in one feeding
 with first dead rodents appearing 4 or 5 days after feeding begins.

CAUTION: Keep out of reach of children.
 Read safety and first aid information on side panel.

MAY BE HARMFUL OR FATAL IF EATEN BY CHILDREN OR PETS

ACTIVE INGREDIENT: Brodifacoum 3-[3-(4'-bromo-[1,1'-biphenyl]-4-yl)-1,2,3,4-tetrahydro-1-naphthalenyl]-4-hydroxy-2H-1-benzopyran-2-one..... 0.005%
 INERT INGREDIENTS..... 99.995%
 TOTAL 100.000%

NET CONTENTS 4/3.0 OZ. (85g) NET WT. 12 OZ. (340g)

d-CON READY MIXED



After

Current



**READY MIXED BAITBITS
KILLS MICE AND RATS**

d-CON Ready Mixed Baitbits can kill in one feeding when used as directed. Kills Warfarin-Resistant House Mice and Warfarin-Resistant Norway Rats.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL: Read this entire label and follow all use directions and precautions.

CAUTION: Do not expose children, pets, or other nontarget animals to this product. To help prevent accidents, do not use this product in a location out of reach of children and pets. Do not use in areas out of reach of children, pets, domestic animals and target wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age. Bait must be used in a manner that prevents such children from reaching into compartments and obtaining bait. If bait can be shaken from stations in which they are lifted, units must be secured or otherwise immobilized. Even when bait stations are needed in areas open to hoofed livestock, swine, horses, bears, other potentially destructive animals, or in areas prone to defilement.

Dispose of product container, and unused, spoiled, and unconsumed bait specified on this label.

RESTRICTIONS: For control of House Mice, Norway Rats, and Roof rats in and around homes, industrial, commercial, agricultural and public buildings. d-CON Ready Mixed Baitbits may also be used in and around sport vehicles (ships, trains, aircraft) and related port or terminal buildings. Do not use in sewers. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food.

SECTION OF TREATMENT AREAS: Place trays in or near points where you see signs of mice or rat signs such as droppings, runways, burrows, or wing marks. Once areas requiring baiting have been identified, proceed as follows:

APPLICATION DIRECTIONS:

Place one ready-to-use bait tray in each potential feeding location. Place trays in dark, out-of-the-way locations, where rodents are likely to find them.

FOR HOUSE MICE: Use only one tray per location.

FOR NORWAY AND ROOF RATS: Start with one tray per location. Add trays, up to a maximum of four per location, if you determine that there is high rat activity at the location.

For best results, leave trays undisturbed for at least two days after placement. However, if contents have been scattered or mostly consumed, replace trays. Clean up spilled bait. Check bait every two days, replacing trays as needed or until signs of rodent activity cease. Trays not used for five consecutive days may be relocated as needed. When there are no longer any signs of rodent activity, dispose of trays properly.

For complete control, continue baiting for at least 15 days. If you are in an area where there is a danger of reinfestation from adjoining property, permanent bait stations should be maintained. Stations should be checked periodically.

CAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

UTIONS: May be harmful or fatal if swallowed. Keep away from humans, domestic animals, and pets. Wash hands after handling bait. IF BAIT IS EATEN BY HUMANS, CALL A PHYSICIAN AT ONCE. For 24 hour emergency assistance, call your local Poison Control Center. IF BAIT IS EATEN BY ANIMALS, CALL YOUR LOCAL VETERINARIAN.

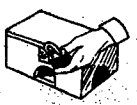
HAZARD TO PHYSICIAN AND VETERINARIAN: This product may reduce the clotting ability of the blood and cause hemorrhaging. The anticoagulant activity of this product may produce prolonged prothrombin times for 20 to 30 days after exposure. If poisoning occurs, intramuscular and oral administration of Vitamin K1 are indicated, as in poisoning from overdose of dicumarol (hydroxy coumarin). FOR HUMAN CASES: Vitamin K1 is antidotal at doses of 10 to 20 mg (not/kg). Repeated treatments may need to be given for up to 30 days (based on monitoring of prothrombin times). In severe cases, blood transfusions may be necessary. FOR ANIMAL CASES: Vitamin K1 is antidotal at 5 mg/kg intramuscularly. Oral Vitamin K1 should be given for up to 30 days at 10 mg/kg (based on monitoring of prothrombin times). In severe cases, blood transfusions may be necessary.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish, birds and wildlife. This product can pose a secondary hazard to birds of prey and mammals. Keep out of any body of water.

ORAGE AND DISPOSAL:

Keep in original container in areas inaccessible to small children and pets. Bait that cannot be used according to label instructions must be disposed of according to applicable federal, state or local procedures.



**READY MIXED BAITBITS
KILLS MICE AND RATS**

**Kills Warfarin-Resistant
House Mice and
Warfarin-Resistant
Norway Rats**

**SAFETY INFORMATION
AND FIRST AID**

CAUTION:

Keep away from children, pets and other animals. May be harmful or fatal if swallowed. If swallowed, this product may reduce the clotting ability of blood and cause bleeding.

FIRST AID: If bait is eaten by humans contact a physician or poison control center (800-XXX-XXXX). If bait is eaten by pets contact a veterinarian.

NOTE TO PHYSICIAN AND VETERINARIAN: This product contains brodifacoum, an anticoagulant. If administered properly, Vitamin K1 is antidotal.

ENVIRONMENTAL HAZARDS

This product is hazardous to animals and birds. Do not apply directly to water.

NOTE TO BUYER AND USER: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller, and Buyer and User assumes the risk of any such use.

EPA Reg. No. 3282-81
EPA Est. No. 3282-OH-1
475-MS-1; 2393-WI-1

**SATISFACTION
GUARANTEED OR
YOUR MONEY BACK**



Simplified



**READY MIXED BAITBITS
KILLS MICE AND RATS**

d-CON Ready Mixed Baitbits can kill in one feeding when used as directed. Kills Warfarin-Resistant House Mice and Warfarin-Resistant Norway Rats.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

READ THIS ENTIRE LABEL. FOLLOW ALL USE DIRECTIONS AND SAFETY INFORMATION.

IMPORTANT!

Place this product out of the reach of children, pets and other animals!

Use this product only to control Norway rats, roof rats and house mice in and around homes, apartments and similar residential buildings.

Baiting Directions

1. Clean up any spilled food or garbage.
2. Place bait out of reach of children and pets in places where rodents or signs of rodents are seen. To find where rodents live and travel, search for droppings, urine stains, signs of gnawing, nests and burrows. Look for these signs in dark, concealed areas, along walls and in corners. Do not place bait out in the open, away from walls or other vertical structures.
3. To keep children or pets from getting to bait, place trays behind heavy appliances and furniture or inside locked cabinets or rooms where children and pets cannot reach them. If bait cannot be placed out of the reach of children and pets, place the bait in a locked, tamper-resistant bait station. Secure bait stations if necessary to prevent spillage. (btd)
4. For house mice, use one tray per location/area. For Norway and roof rats, start with one tray per location/area and add up to a maximum of four trays per location/area if you determine that there is a high level of rat activity at the location.
5. For best results, leave trays undisturbed for at least two days. However, if contents have been scattered or mostly consumed sooner, replace trays. Keep spilled bait cleaned up. Check bait every two days, replacing trays as needed or until there are no more signs of mice or rats. Trays not fed from for five consecutive days may be relocated as needed. When there are no more signs of mice or rats, dispose of trays as instructed on the side panel.
6. For complete control, continue baiting for at least 15 days. If you are in an area where you may get reinfestation from adjoining property, permanent bait placements should be made. Permanent placements should be checked periodically.
7. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in contact with food.
8. Collect and dispose of dead rodents properly.
9. To keep rats and mice away, clean up spilled food immediately and remove garbage. Clean up areas where mice and rats may nest and breed.

STORAGE AND DISPOSAL

- Product not being used should be stored out of the reach of children and pets.
- Store product not being used in the original, closed container in a cool, dry place.
- Do not reuse container.
- Wrap the used container or spilled and leftover product in newspaper and throw away in trash.

**KILLS WARFARIN-RESISTANT NORWAY RATS
AND WARFARIN-RESISTANT HOUSE MICE**

**KILLS WARFARIN-RESISTANT NORWAY RATS
AND WARFARIN-RESISTANT HOUSE MICE**

Before

After